

**ORIGINAL**

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Docket No. MC98-1

Mailing Online Service

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS GARVEY TO INTERROGATORY OF  
OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-4 REDIRECTED FROM THE POSTAL SERVICE)

The United States Postal Service hereby provides the response to the following  
interrogatory of Office of the Consumer Advocate: OCA/USPS-4, filed on August 7,  
1998, and redirected from the Postal Service.


The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

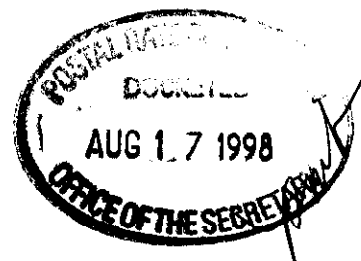
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
(202) 268-3083; Fax: -5402  
Washington, D.C. 20260-1137  
August 17, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE,  
REDIRECTED FROM UNITED STATES POSTAL SERVICE  
OCA/USPS-4. The following interrogatory refers to the Postal Service's Mailing  
Online Service (MOS) offering.

- a. For each type of print option offered, will all Postal Service contract printers have identical print capabilities? Please explain.
- b. If your response to part "a." of this interrogatory is not affirmative, how will the Postal Service direct different print options to the various contract printers?
- c. What recourse does an MOS customer have if a contract printer makes an error and a document is "stuffed" into the wrong envelope?
- d. What recourse does an MOS customer have if the Postal Service makes a data transmission error and a document is "stuffed" into the wrong envelope?
- e. Referring to parts "c." and "d." of this interrogatory, what liability does the Postal Service anticipate it has if an error is made by either the Postal Service or one of its contract printers?

RESPONSE:

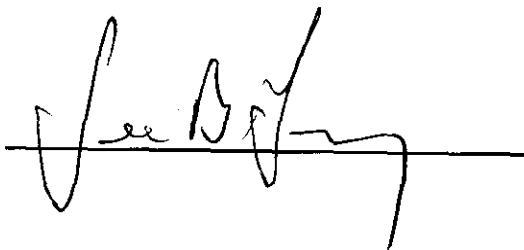
- a. Each print site will be required to support a minimum number of identical print capabilities. Initial print options are quite limited and are presumed at this time to represent a baseline set of capabilities. As customer demands become more apparent and as printing technology advances, we expect to evaluate this approach and may decide to situate specialized capabilities at one or more print sites.
- b. Although the capability is not required at this time, system design allows automatic routing of jobs based upon specific printing requirements as well as destination ZIP Codes.
- c-d. See my Response to DFC/USPS-T1-5.
- e. The Postal Service will monitor and ensure quality performance in all aspects of Mailing Online service. The Postal Service's contract printers are required to investigate and correct errors found to be their fault. This includes reprinting materials not conforming to job and proof

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specifications. See USPS-LR-5/MC98-1, 1.2.6 (B). Errors reported that are found to be other than printer error will be investigated and corrected at Postal Service expense. Credits or refunds will be considered as appropriate.

## DECLARATION


I, Lee Garvey, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Lee Garvey", is written over a horizontal line.

Dated: 8/17/98

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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Kenneth N. Hollies

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